S. LANE TUCKER United States Attorney

MARIE C. SCHEPERLE Civil Chief, Assistant U. S. Attorney 222 West 7<sup>th</sup> Ave., #9, Rm. 253 Anchorage, AK 99513-7567

Phone: (907) 271-5071 Fax: (907) 271-2344

E-mail: Marie.Scheperle@usdoj.gov

Attorneys for the United States of America

## IN THE UNITED STATES DISTRICT COURT

## FOR THE DISTRICT OF ALASKA

UNITED STATES OF AMERICA ex rel. JACOB HALSOR,	) ) Case No. 3:20-cv-00063-HRH
Plaintiffs,	) )
vs.	) )
BEST CHOICE CONSTRUCTION	
LLC; RYAN DALBEC; RAIHANA	)
NADEM; and BRIAN LOWELL	
NASH, II	
Defendants.	

## PLAINTIFF'S RESPONSE IN OPPOSITION (PARTIAL) TO DEFENDANT DALBEC'S MOTION TO STAY

The United States, through counsel, partially opposes Defendant Ryan Dalbec's second motion to stay the case [Dkt. 80] for an extension of time so that he may attempt to retain counsel. The Government is reluctant to agree to another lengthy stay because Mr. Dalbec has already had six months to explore obtaining counsel, and it is not clear

from his filing whether additional time would be fruitful. However, the Government agrees to a 30-day extension for this purpose. Should Mr. Dalbec retain counsel, the Government will consider any requests for extension to respond to the pending motion [Dkt. 64] at that time. If Mr. Dalbec is unable to retain counsel within 30 days, the Government requests that he respond to the pending motion.

RESPECTFULLY SUBMITTED on December 12, 2023, at Anchorage, Alaska.

S. LANE TUCKER United States Attorney

s/ Marie C. Scheperle
Civil Chief
United States of America

## CERTIFICATE OF SERVICE

I hereby certify that on December 12, 2023, a copy of the foregoing was served via email on all counsel of record, including:

Jeffrey A. Newman jeffrey@jeffreynewmanlaw.com

Lisa Rosano
<a href="mailto:lisa-rosano@weidnerjustice.com">lrosano@weidnerjustice.com</a>
<a href="mailto:Attorneys for Relator">Attorneys for Relator</a>

Via U.S. Certified Mail on:

Raihana Nadem 4729 San Sebastián Dr Woodland Hills, CA 91364

U.S. ex rel. Halsor v. Best Choice Construction, LLC et. Al Case No. 3:20-cv-00063-HRH

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Best Choice Construction, LLC ND Secretary of State (Registered Agent) 600 E Boulevard Ave Dept 108 Bismarck, ND 58505-0500

Ryan Dalbec 130 Cordova St. Anchorage, AK 99501

Brian Lowell Nash II- Defendant 36031-509 FCI Sheridan Federal Correctional Institution P.O. Box 5000 Sheridan, OR 97378

s/ Marie C. Scheperle
Office of the U.S. Attorney